

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 Northern Division

4
5 WILLIAM R. CARROLL, et al.

6 Plaintiffs

7 v.

CIVIL ACTION NO.

8 MJG-02-CV-2084

9 BENJAMIN J. MARTIN, et al.

10 Defendants

11
12 _____/

13
14 The deposition of RAYMOND CURTIS was
15 held on Wednesday, January 8, 2003, commencing at
16 2:50 p.m., at the Offices of Execusuites, Inc.,
17 15200 Shady Grove Road, Suite 350, Rockville,
18 Maryland, 20850, before Susan M. Liebrecht, a Notary
19 Public.

20
21 APPEARANCES:

22 HENRY L. BELSKY, ESQUIRE

23 On behalf of Plaintiffs

24 MICHAEL B. MANN, ESQUIRE

25 On behalf of Defendants

26
27 REPORTED BY: Susan M. Liebrecht

28

1 there may be a dozen times over, you know, a couple
2 years' time in that particular area.

3 Q. When was the last time you were on 27
4 before this accident?

5 A. During the summertime. Summer before
6 that.

7 Q. So, this accident happened on
8 November 16th.

9 MR. MANN: January 16th.

10 Q. I'm sorry, January 16th. And it had
11 been at least five or six months -

12 A. Probably around the August, September
13 timeframe.

14 Q. You indicated this was a broken up soft
15 patch in this area. Was that your recollection from
16 six months ago or was there some other moment where
17 you looked at it in between the last time that you
18 rode your bicycle?

19 A. Everyday when I drove by I could see it
20 was broken up. As a matter of fact, there were two
21 spots that were crumbled. There was one another

22